

PAUL BATISTA, P.C.  
Attorney-at-Law  
26 Broadway - Suite 1900  
New York, New York 10004  
(631) 377-0111

e-mail: Batista007@aol.com

Facsimile: (212) 344-7677

October 24, 2023

VIA ECF

Hon. John G. Koeltl  
United States District Judge for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **Vanek v. Samsung EMS Co. Ltd., et al.,**  
**Docket No. 1:23-cv-03127 (JGK)**

Dear Judge Koeltl:

I represent plaintiff Yaakov Vanek in the above-entitled action.

I write to request a brief extension, from October 23, 2023 to *November 21, 2023*, of the time in which Mr. Vanek may move by Order to Show Cause for default judgment as to defendants Samsung EMS Co., Ltd., Sang-Won Lee, S.G. Lee and J.S. Park (the "Remaining Defendants").

We are experiencing some unanticipated delay in obtaining the Clerk's Certificate of Default regarding the Remaining Defendants. The Clerk's Certificate of Default is essential, pursuant to Local Civil Rule 55.2(b), to obtaining a default judgment from Your Honor.

We anticipate that we will receive the relevant Certificate from the Clerk's Office by November 21, 2023.


Accordingly, I respectfully request that Your Honor extend to November 21, 2023 the time in which plaintiff may move by Order to Show Cause for default judgment against the Remaining Defendants.

Respectfully submitted,



Paul Batista

APPLICATION GRANTED  
SO ORDERED



John G. Koeltl, U.S.D.J.

10/25/23